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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) Case No. CR.S-04-381-FCD
12 v.)
13)
14)
15 MIGUEL ANGEL SANCHEZ, et al.,) Date: June 20, 2005
Defendant.) Time: 9:30 a.m.
) Judge: Honorable Frank C. Damrell

**STIPULATION AND ORDER;
EXCLUSION OF TIME**

17 IT IS HEREBY STIPULATED by and between the parties hereto through
18 their respective counsel, SAMUEL WONG, Assistant United States
19 Attorney, attorney for Plaintiff, MARK J. REICHEL, CHRIS HAYDEN-MAYER,
20 ESQ., JESSE SANTANA, ESQ., attorneys for all defendants, that the
21 previously scheduled change of plea hearing date of May 31, 2005 be
22 vacated and the matter set for change of plea on June 20, 2005 at 9:30
23 am.

24 This continuance is requested because defense counsel Reichel
25 will be out of town on training May 31st through June 6th. As well, all
26 defense counsel also need additional time to review discovery with the
27 defendant, conduct legal research, perform background factual
28 Stip and Order

1 investigation, and properly prepare for a potential change of plea.

2 Accordingly, all counsel and the defendant agree that time under
3 the Speedy Trial Act from the date this stipulation is lodged, through
4 June 20, 2005, should be excluded in computing the time within which
5 trial must commence under the Speedy Trial Act, pursuant to Title 18
6 U.S.C. § 3161 (H)(8)(B)(iv) and Local Code T4. Additionally, there is
7 a motion pending in the magistrate court which is scheduled for July
8 15, 2005, so time will be excluded under Local Code E up until that
9 time, July 15, 2005.

10 DATED: May 27, 2005.

Respectfully submitted,

11 QUIN DENVER
12 Federal Public Defender

13 DATED: May 27, 2005.

14 /s/MARK J. REICHEL
15 MARK J. REICHEL
Assistant Federal Defender
Attorney for Defendant

16 /s/MARK J. REICHEL
17 CHRISTOPHER HAYDEN MEYER, ESQ
18 Attorney for Defendant

19 /s/MARK J. REICHEL
20 JESSE SANTANA, ESQ
21 Attorney for Defendant

22 McGREGOR SCOTT
23 United States Attorney

24 DATED: May 27, 2005.

25 /s/MARK J. REICHEL for
26 SAMUEL WONG
Assistant U.S. Attorney
27 Attorney for Plaintiff

1 **O R D E R**

2 That the previously scheduled change of plea hearing date of
3 May 31, 2005 be vacated and the matter set for change of plea on
4 June 20, 2005 at 9:30 am.

5 The court finds that the interests of justice in granting the
6 continuance outweighs the public's interest in a speedy trial and
7 therefore time is excluded in the interests of justice pursuant to
8 18 U.S.C. § 3161 (H)(8)(B)(iv) and Local Code T4 and Local Code E.

9 **IT IS SO ORDERED.**

10 DATED: May 27, 2005

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 /s/ Frank C. Damrell Jr.

12 FRANK C. DAMRELL, JR.

13 United States DISTRICT JUDGE